

**Almer Casile**

**From:** Jay DeLeon [jayd@spunstrand.com]  
**Sent:** Friday, June 23, 2006 11:51 AM  
**To:** Almer Casile  
**Cc:** 'Kirk Nelson'  
**Subject:** Questions PTC

Almer,

Here are the answers to the questions from your March 22, 2006 fax to Kirk Nelson.

**Question #1 63.5790**

- A) existing source
- B) open molding`  
mixing  
cleaning of equipment used in reinforced plastic composites manufacture  
HAP-containing materials storage  
Repair on parts we also manufacture
- C) At this time no exclusion
- D) At this time no resin that must meet military specifications

**Question #2 Table 1 of 40 CFR 63 the HAP emission factors that apply to Spunstrand Inc...**

- |                |   |                              |
|----------------|---|------------------------------|
| 1. open mold   | a.) manual resin application                | i) nonvapor-suppressed resin |
|                | b) N/A                                      |                              |
|                | c) nonatomized mechanical resin application | i) nonvapor-suppressed resin |
|                | d) N/A                                      |                              |
|                | e) filament application                     | i) nonvapor-suppressed resin |
|                | f) atomized spray gel coat application      | nonvapor-suppressed resin    |
|                | g) N/A                                      |                              |
|                | h) N/A                                      |                              |
| 2. centrifugal | a) N/A                                      |                              |
|                | b) N/A                                      |                              |

Also, please don't forget that I need the lists of Idaho's air pollutants, from 585,586.

Thank you,  
 Jay DeLeon  
 Plant Superintendent  
 Spunstrand Inc.

## Almer Casile

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**From:** Jay DeLeon [jayd@spunstrand.com]  
**Sent:** Friday, August 11, 2006 10:29 AM  
**To:** Almer Casile  
**Subject:** RE: Date of Commencement of Construction

Almer,

The first part of the facility was built in 1959 and added to in 1972. We had a separate steel building added in 1998.

Thank you,  
Jay De Leon

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**From:** Almer.Casile@deq.idaho.gov [mailto:Almer.Casile@deq.idaho.gov]  
**Sent:** Friday, August 11, 2006 8:34 AM  
**To:** jayd@spunstrand.com  
**Subject:** Date of Commencement of Construction

Jay,

When was the Spunstrand facility built?

Almer Casile  
Permit Writer  
Dept. of Environment Quality  
1410 N. Hilton St.  
Boise, ID 83706-1255  
P: (208) 373-0216  
F: (208) 373-0340

9/22/2006

**Almer Casile**

**From:** Jay DeLeon [jayd@spunstrand.com]  
**Sent:** Monday, July 17, 2006 12:54 PM  
**To:** Almer Casile  
**Subject:** RE: Questions PTC

Almer,

The answers two the questions below are as follows.

1. Yes we manufacture large open molded parts.
2.
  1. Open molding corrosion resistant and/or high strength (CR/HS)
    - a. Yes
    - b. Yes
    - c. Yes
  2. N/A
  3. N/A
  4. Open molding low-flame spread / low-smoke products
    - a. Yes
    - b. Yes
    - c. Yes
  5. N/A
  6. Open molding gel coat
    - a. Yes
    - b. Yes
    - c. Yes
    - d. No
    - e. No
    - f. No
  7. N/A
  8. N/A
  9. N/A
  10. N/A
3. No
4. We are not planning on using add-on control device(s) at this time. However, if we must use add-on control device(s) to comply we will to be compliant.

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**From:** Almer.Casile@deq.idaho.gov [mailto:Almer.Casile@deq.idaho.gov]  
**Sent:** Friday, June 23, 2006 11:41 AM  
**To:** jayd@spunstrand.com  
**Subject:** RE: Questions PTC

Jay,

Now that I have some info, I also have some more questions based on your recent email. Please answer the following questions for me:

**1. Does the facility manufacture large open molded parts?**

A large open molding part is defined as a part that, when the final finished part is enclosed in the smallest rectangular six-sided box into which the part can fit, the total interior volume of the box exceeds 250 cubic feet, or any interior sides of the box exceed 50 square feet.

**2. Which operation type listed below applies to the facility?**

Table 3 to Subpart WWWW of Part 63. Organic HAP Emissions Limits for  
 Specific Open Molding, Centrifugal Casting, Pultrusion and Continuous  
 Lamination/Casting Operations

-----  
 \1\ Your organic

9/22/2006

If your operation type is . . .	And you use . . .	HAP emissions limit is . . .
1. open molding_corrosion- resistant and/or high strength (CR/HS).	a. mechanical resin application. b. filament application. c. manual resin application.	113 lb/ton. 171 lb/ton. 123 lb/ton.
2. open molding_non-CR/HS.....	a. mechanical resin application. b. filament application. c. manual resin application.	88 lb/ton. 188 lb/ton. 87 lb/ton.
3. open molding_tooling.....	a. mechanical resin application. b. manual resin application.	254 lb/ton. 157 lb/ton.
4. open molding_low-flame spread/ low-smoke products.	a. mechanical resin application. b. filament application. c. manual resin application.	497 lb/ton. 270 lb/ton. 238 lb/ton.
5. open molding_shrinkage controlled resins \2\.	a. mechanical resin application. b. filament application. c. manual resin application.	354 lb/ton. 215 lb/ton. 180 lb/ton.
6. open molding_gel coat \3\....	a. tooling gel coating. b. white/off white pigmented gel coating. c. all other pigmented gel coating. d. CR/HS or high performance gel coat. e. fire retardant gel coat. f. clear production gel coat.	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.
7. centrifugal casting_CR/HS....	a. resin application with the mold closed, and the mold is vented during spinning and cure. b. resin application with the mold closed, and the mold is not vented during	25 lb/ton.\4\ NA_this is considered to be a closed molding operation. 25 lb/ton.\4\ Use the appropriate open molding emission limit.\5\

spinning and cure.

c. resin application with the mold open, and the mold is vented during spinning and cure.

d. resin application with the mold open, and the mold is not vented during spinning and cure.

8. centrifugal casting\_non-CR/HS

a. resin	20 lb/ton.\4\
application with	NA this is
the mold closed,	considered to be
and the mold is	a closed molding
vented during	operation.
spinning and cure.	20 lb/ton.\4\
b. resin	Use the
application with	appropriate open
the mold closed,	molding emission
and mold is not	limit.\5\
vented during the	
spinning and cure.	
c. resin	
application with	
the mold open,	
and the mold is	
vented during	
spinning and cure.	
d. resin	
application with	
the mold open,	
and the mold is	
not vented during	
spinning and cure.	

9. pultrusion \6\..... N/A..... reduce total  
organic HAP  
emissions by at  
least 60 weight  
percent.

10. continuous lamination/ casting.	N/A.....	reduce total organic HAP emissions by at least 58.5 weight percent or not exceed an organic HAP emissions limit of 15.7 lbs of organic HAP per ton of neat resin plus and neat gel coat plus.
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\\ Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

\2) This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

- \3\ If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.
- \4\ For compliance purposes, calculate your emission factor using only the appropriate centrifugal casting equation in item 2 of Table 1 to this subpart, or a site specific emission factor for after the mold is closed as discussed in § 63.5796.
- \5\ Calculate your emission factor using the appropriate open molding covered cure emission factor in item 1 of Table 1 to this subpart, or a site specific emission factor as discussed in § 63.5796.
- \6\ Pultrusion machines that produce parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more are not subject to this requirement. Their requirement is the work practice of air flow management which is described in Table 4 to this subpart.

3. Is the repair work done at the facility involve/include the non-routine manufacture of individual components or parts intended to repair a larger item as defined above?

4. Does Spunstrand propose to use add-on control device(s) to comply with this subpart?

Almer Casile  
 Permit Writer  
 Dept. of Environment Quality  
 1410 N. Hilton St.  
 Boise, ID 83706-1255  
 P: (208) 373-0216  
 F: (208) 373-0340

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**From:** Jay DeLeon [mailto:jayd@spunstrand.com]  
**Sent:** Friday, June 23, 2006 11:51 AM  
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| 1. open mold | a.) manual resin application                | i) nonvapor-suppressed resin |
|              | b) N/A                                      |                              |
|              | c) nonatomized mechanical resin application | i) nonvapor-suppressed resin |
|              | d) N/A                                      |                              |
|              | e) filament application                     | i) nonvapor-suppressed resin |

9/22/2006

f) atomized spray gel coat application  
g) N/A  
h) N/A

nonvapor-suppressed resin

2. centrifugal    a) N/A  
                      b) N/A

Also, please don't forget that I need the lists of Idaho's air pollutants, from 585,586.

Thank you,  
Jay DeLeon  
Plant Superintendent  
Spunstrand Inc.

9/22/2006

**Spidell and Associates**  
2403 Spaulding, Boise, Idaho 83705  
**(208) 336-4862**

February 5, 2004

Almer Casile  
Staff Engineer  
Idaho Department of Environmental Quality  
1410 North Hilton  
Boise, Idaho 83705

RE: Spunstrand Tier I Application

Dear Mr. Casile,

Please find attached the Applicable Requirements list with a compliance certification summary that you outlined in the meeting with myself and Randy Norell. A list of Emission Units is attached as page 13.

Also, included in a compliance plan. Page 1 is a activity summary with the monitoring and record keeping functions on pages 2 and 3.

We obtained two Tier 1 applications of permitted sources and combined the information from both.

Thank you for your help. It took longer to obtain copies of the permits and find the 40 CFR Subpart WWW. I purchased the WWW and would share with you.

Please let me know if you want the tables on disk. I would e-mail them to you.

Sincerely,

  
Ron Spidell



19487



**AIR POLLUTION CONTROL REGULATIONS**  
**APPLICABLE REQUIREMENTS AND COMPLIANCE CERTIFICATION SUMMARY**

Emissions Unit(s) (see coding, page 12)	Applicable Requirement	Non-Applicable Reason	Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Record keeping, Monitoring, Reporting, Test Method)	In Compliance
NA	No	Applies to regulatory authorities.	000	LEGAL AUTHORITY General Applicability	Not required under this section.	NA
NA	Yes		001	TITLE AND SCOPE General Applicability	Not required under this section.	Yes
NA	Yes		002	WRITTEN INTERPRETATIONS General Applicability	Not required under this section.	Yes
NA	Yes		003	ADMINISTRATIVE APPEALS General Applicability	Not required under this section.	Yes
NA	Yes		004	CATCHLINES General Applicability	Not required under this section.	Yes
NA	Yes		005	DEFINITIONS General Applicability	Not required under this section.	Yes
NA	Yes		006	GENERAL DEFINITIONS General Applicability	Not required under this section.	Yes
NA	Yes		007	DEFINITIONS FOR THE PURPOSES OF SECTIONS 200 THROUGH 223 AND 400 THROUGH 461 General Applicability	Not required under this section.	Yes
NA	Yes		008	DEFINITIONS FOR THE PURPOSES OF SECTIONS 300 THROUGH 386 General Applicability	Not required under this section.	Yes
NA	Yes		009	DEFINITIONS FOR THE PURPOSES OF 40 CFR PART 60 General Applicability	Not required under this section.	Yes
NA	Yes		010	DEFINITIONS FOR THE PURPOSES OF 40 CFR PART 61 AND 40 CFR PART 63 General Applicability	Not required under this section.	Yes
NA	Yes		106	ABBREVIATIONS General Applicability	Not required under this section.	Yes
NA	Yes		107	INCORPORATIONS BY REFERENCE General Applicability	Not required under this section.	Yes

# AIR POLLUTION CONTROL REGULATIONS

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Emissions Unit(s) (see coding, page 12)	Applicable Requirement	Non-Applicable Reason	Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Record keeping, Monitoring, Reporting, Test Method)	In Compliance
1 - 7	Yes		121	COMPLIANCE REQUIREMENTS BY DEPARTMENT General Applicability	Permit application, record keeping and reporting.	Yes
1 - 7	Yes		122	INFORMATION ORDERS BY THE DEPARTMENT General Applicability	Record keeping and reporting.	Yes
1 - 7	Yes		123	CERTIFICATION OF DOCUMENTS General Applicability	Record keeping and reporting.	Yes
1 - 7	Yes		124	TRUTH, ACCURACY AND COMPLETENESS OF DOCUMENTS General Applicability	Record keeping and reporting.	Yes
1 - 7	Yes		125	FALSE STATEMENTS General Applicability	Record keeping and reporting.	Yes
1 - 7	Yes		126	TAMPERING General Applicability	Record keeping and reporting.	Yes
1 - 7	Yes		127	FORMAT OF RESPONSES General Applicability	Record keeping and reporting.	Yes
NA	Yes		128	CONFIDENTIAL INFORMATION General Applicability	Not required under this section.	Yes
1 - 4, 6	Yes		130 - 136	STARTUP, SHUTDOWN, SCHEDULED MAINTENANCE, SAFETY MEASURES, UPSET AND BREAKDOWN General Applicability	Record keeping and reporting.	Yes
NA	Yes		140 - 149	VARIANCE PROCEDURES AND PETITIONS General Applicability	Not required under this section.	Yes
1 - 4, 6	Yes		154	CIRCUMVENTION General Applicability	Record keeping and reporting.	Yes
1 - 7	Yes		156	TOTAL COMPLIANCE General Applicability	Record keeping and reporting.	Yes
1 - 7	Yes		157	TEST METHODS AND PROCEEDURES General Applicability	Record keeping and reporting.	Yes
NA	Yes		160	PROVISIONS GOVERNING SPECIFIC ACTIVITIES AND CONDITIONS General Applicability	Not required under this section.	Yes
1 - 5	Yes		161	TOXIC SUBSTANCES	Record keeping and reporting.	Yes

# AIR POLLUTION CONTROL REGULATIONS

## APPLICABLE REQUIREMENTS AND COMPLIANCE CERTIFICATION SUMMARY

Emissions Unit(s) (see coding, page 12)	Applicable Requirement	Non-Applicable/Reason	Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Record keeping, Monitoring, Reporting, Test Method)	In Compliance
1 - 6	Yes		162	MODIFYING PHYSICAL CONDITIONS General Applicability	Record keeping and reporting.	Yes
NA	Yes		163	SOURCE DENSITY General Applicability	Record keeping and reporting.	Yes
NA	No		164	POLYCHLORINATED BIPHENYLS	Not required under this section	Yes
1 - 7	Yes		200 - 223	PROCEDURES AND REQUIREMENTS FOR PERMITS TO CONSTRUCT	Tier I permit application contains information required by sections 200 - 219.	Yes
1 - 7	Yes		300	PROCEDURES AND REQUIREMENTS FOR TIER I OPERATING PERMITS General Applicability	Permit application, record keeping and reporting	Yes
1 - 7	Yes		301	REQUIREMENT TO OBTAIN TIER I OPERATING PERMIT General Applicability	Permit application, record keeping and reporting	Yes
NA	NA	Facility is not this source type.	302	OPTIONAL TIER I OPERATING PERMIT General Applicability	Not required under this section.	Yes
1 - 7	Yes		311 - 315	STANDARD PERMIT APPLICATIONS General Applicability	Permit application, record keeping and reporting	Yes
1 - 7	Yes		316	EFFECT OF INACCURATE INFORMATION IN APPLICATIONS OR FAILURE TO SUBMIT RELEVANT INFORMATION General Applicability	Permit application, record keeping and reporting	Yes
NA	Yes		317	INSIGNIFICANT ACTIVITIES General Applicability	Permit application, record keeping and reporting	Yes
1 - 7	Yes		321	TIER I OPERATING PERMIT CONTENT General Applicability	Permit application, record keeping and reporting	Yes
1 - 7	Yes		322	STANDARD CONTENTS OF TIER I OPERATING PERMITS General Applicability to Tier I Sources	Permit application, record keeping and reporting	Yes
1 - 7	Yes		325	ADDITIONAL CONTENTS OF TIER I OPERATING PERMITS - PERMIT SHIELD General Applicability to Tier I Sources	Permit application, record keeping and reporting	Yes
1 - 7	Yes		332	EMERGENCY AS AN AFFIRMATIVE DEFENCE REGARDING EXCESS EMISSIONS General Applicability to Tier I Sources	Record keeping and reporting.	Yes

# AIR POLLUTION CONTROL REGULATIONS

## APPLICABLE REQUIREMENTS AND COMPLIANCE CERTIFICATION SUMMARY

Emissions Unit(s) (see coding, page 12)	Applicable Requirement	Non-Applicable Reason	Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Record keeping, Monitoring, Reporting, Test Method)	In Compliance
1 - 7	Yes		335	GENERAL TIER I OPERATING PERMITS AND AUTHORIZATIONS TO OPERATE	Permit application, record keeping and reporting	Yes
NA	No	Not a portable source	336	TIER I OPERATING PERMITS FOR TIER I PORTABLE SOURCES	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	360	STANDARD PROCESSING OF TIER I OPERATING PERMIT APPLICATIONS General Applicability to Tier I Sources	Not required under this section.	NA
1 - 7	Yes		361	COMPLETENESS OF APPLICATIONS General Applicability to Tier I Sources	Permit application, record keeping and reporting	Yes
NA	No	Section applies to regulatory authorities	362	TECHNICAL MEMORANDUMS FOR TIER I OPERATING PERMITS	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	363	PREPARATION OF DRAFT PERMIT OR DRAFT DENIAL	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	364	PUBLIC NOTICES, COMMENTS AND HEARINGS General Applicability to Tier I Sources	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	365	PREPARATION OF PROPOSED PERMIT OR DENIAL	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	366	EPA REVIEW PROCEDURES	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	367	ACTION ON APPLICATION General Applicability to Tier I Sources	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	368	EXPIRATION OF PRECEDING PERMITS General Applicability to Tier I Sources	Not required under this section.	NA
1 - 7	Yes		369	TIER I OPERATING PERMIT RENEWAL General Applicability to Tier I Sources	Permit application, record keeping and reporting	Yes
1 - 7	Yes		380	CHANGES TO TIER I OPERATING PERMITS General Applicability to Tier I Sources	Permit application, record keeping and reporting	Yes
1 - 7	Yes		381	ADMINISTRATIVE PERMIT AMENDMENTS General Applicability to Tier I Sources	Permit application, record keeping and reporting	Yes
1 - 7	Yes		382	SIGNIFICANT PERMIT MODIFICATION General Applicability to Tier I Sources	Permit application, record keeping and reporting	Yes
1 - 7	Yes		383	MINOR PERMIT MODIFICATION General Applicability to Tier I Sources	Permit application, record keeping and reporting	Yes

# AIR POLLUTION CONTROL REGULATIONS

## APPLICABLE REQUIREMENTS AND COMPLIANCE CERTIFICATION SUMMARY

Emissions Unit(s) (see coding, page 12)	Applicable Requirement	Non-Applicable Reason	Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Record keeping, Monitoring, Reporting, Test Method)	In Compliance
1 - 7	Yes		384	SECTION 502(b)(10) CHANGES AND CERTAIN EMISSION TRADES General Applicability to Tier I Sources	Permit application, record keeping and reporting	Yes
1 - 7	Yes		385	OFF-PERMIT CHANGES AND NOTICE General Applicability to Tier I Sources	Permit application, record keeping and reporting	Yes
NA	No	Section applies to regulatory authorities.	386	REOPENING FOR CAUSE General Applicability to Tier I Sources	Not required under this section.	NA
NA	No	Facility is not this source type.	400 -406	PROCEDURES AND REQUIREMENTS FOR TIER II OPERATING PERMITS General Applicability to Tier II Sources	Not required under this section.	NA
NA	Yes		440	REQUIREMENTS FOR ALTERNATIVE EMISSION LIMITS (BUBBLES)	Not required under this section.	Yes
NA	Yes		441	DEMONSTRATION OF AMBIENT EQUIVALENCE	Not required under this section.	Yes
NA	Yes		460	REQUIREMENTS FOR EMISSION REDUCTION CREDIT	Not required under this section.	Yes
NA	Yes		461	REQUIREMENTS FOR BANKING EMISSION REDUCTION CREDITS (ERC'S)	Not required under this section.	Yes
NA	No	Facility is not this source type.	470	PERMIT APPLICATION FEES FOR TIER II PERMITS	Not required under this section.	NA
NA	No	Facility is not this source type.	500	REGISTRATION PROCEDURES AND REQUIREMENTS FOR PORTABLE EQUIPMENT	Not required under this section.	NA
NA	Yes		510 - 516	STACK HEIGHTS AND DISPERSION TECHNIQUES - APPLICABILITY, DEFINITIONS, REQUIREMENTS, OPPORTUNITY FOR PUBLIC HEARING, APPROVAL OF FIELD STUDIES AND FLUID MODELS, AND NO RESTRICTION ON ACTUAL STACK HEIGHT	Not required under this section.	Yes
NA	Yes		525	REGISTRATION AND REGISTRATION FEES	Not required under this section.	Yes
NA	Yes		526	APPLICABILITY	Not required under this section.	Yes
NA	Yes		527	REGISTRATION	Not required under this section.	Yes
NA	Yes		528	REQUEST FOR INFORMATION	Information provided as requested	Yes
1 - 7	Yes		530	REGISTRATION FEE	Paid according to requirements	Yes

# AIR POLLUTION CONTROL REGULATIONS

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NA	Yes		531	REGISTRATION BY THE DEPARTMENT	Information provided as requested	Yes
NA	Yes		532	PAYMENT DUE	Paid according to requirements	Yes
NA	Yes		533	EFFECT OF DELINQUENCY ON APPLICATIONS	Paid according to requirements	Yes
NA	Yes		534	APPEALS	Not required under this section	Yes
NA	Yes		535	AMENDING REGISTRATION	Paid according to requirements	Yes
NA	Yes		536	CHECKS SHOULD BE MADE OUT TO "DEPARTMENT OF ENVIRONMENTAL QUALITY - AQ REGISTRATION FEE"	Paid according to requirements	Yes
NA	No	Facility is not in this source category	537	EXEMPTIONS	Not required under this section	NA
NA	Yes		538	LUMP SUM PAYMENTS OF REGISTRATION FEES	Paid according to requirements	Yes
NA	Yes		550	AIR POLLUTION EMERGENCY RULE	Information provided as requested	Yes
NA	No	Section applies to regulatory authorities	551	EPISODE CRITERIA	Not required under this section	NA
NA	No	Section applies to regulatory authorities	552	STAGES	Not required under this section	NA
NA	No	Section applies to regulatory authorities	553	EFFECT OF STAGES	Not required under this section	NA
NA	No	Section applies to regulatory authorities	556	CRITERIA FOR DEFINING LEVELS WITHIN STAGES	Not required under this section	NA
NA	No	Section applies to regulatory authorities	557	PUBLIC NOTIFICATION	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	558	INFORMATION TO BE GIVEN	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	559	MANNER AND FREQUENCY OF NOTIFICATION	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	560	NOTIFICATION TO SOURCES	Not required under this section.	NA
NA	Yes		561	GENERAL RULES	Information provided as requested	Yes

# AIR POLLUTION CONTROL REGULATIONS

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6	Yes		562	SPECIFIC EMERGENCY EPISODE ABATEMENT PLANS FOR POINT SOURCES	Information provided as requested	Yes
NA	Yes		575	AIR QUALITY STANDARDS AND AREA CLASSIFICATION	Information and reporting provided as requested	Yes
NA	Yes		576	GENERAL PROVISIONS FOR AMBIENT AIR QUALITY STANDARDS	Information and reporting provided as requested	Yes
NA	Yes		577	AMBIENT AIR QUALITY STANDARDS FOR SPECIFIC AIR POLLUTANTS	Information and reporting provided as requested	Yes
NA	No	Facility is not located in a special control or nonattainment area.	578	DESIGNATION OF ATTAINMENT, UNCLASSIFIABLE, AND NONATTAINMENT AREAS	Not required under this section.	NA
NA	No	No changes or modifications have been made to this facility to trigger these requirements.	579	BASELINES FOR PREVENTION OF SIGNIFICANT DETERIORATION	Not required under this section.	NA
NA	No	No changes or modifications have been made to this facility to trigger these requirements.	580	CLASSIFICATION OF PREVENTION OF SIGNIFICANT DETERIORATION AREAS	Not required under this section.	NA
NA	No	No changes or modifications have been made to this facility to trigger these requirements.	581	PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENTS	Not required under this section	NA
1 - 5	Yes		585	TOXIC AIR POLLUTANTS NON-CARCINOGENIC INCREMENTS	Permit application, record keeping and reporting	Yes
NA	Yes		586	TOXIC AIR POLLUTANTS CARCINOGENIC INCREMENTS		Yes
NA	Yes		587	LISTING OR DELISTING TOXIC AIR POLLUTANT INCREMENTS	Not required under this section.	Yes
NA	No	Facility is not this source category	590	NEW SOURCE PERFORMANCE STANDARDS	Not required under this section.	NA
1 - 5	Yes		591	NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS	Record keeping and reporting.	Yes
NA	Yes		600	RULES FOR CONTROL OF OPEN BURNING	Not required under this section.	Yes
NA	Yes		601	FIRE PERMITS, HAZARDOUS MATERIALS AND LIABILITY	Not required under this section.	Yes

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NA	Yes		602	NONPREEMPTION OF OTHER JURISDICTIONS	Not required under this section.	Yes
NA	Yes		603	GENERAL RESTRICTIONS	Not required under this section.	Yes
NA	No	Section applies to regulatory authorities	604	ALTERNATIVES TO OPEN BURNING	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	606	CATEGORIES OF ALLOWABLE BURNING	Not required under this section.	NA
NA	No	Facility is not in this source category	607	RECREATIONAL AND WARMING FIRES	Not required under this section.	NA
NA	Yes		608	WEED CONTROL FIRES	Not required under this section.	Yes
NA	No	Procedure not used by this facility	609	TRAINING FIRES	Not required under this section.	NA
NA	No	Facility does not have this emission unit.	610	INDUSTRIAL FLARES	Not required under this section.	NA
NA	No	Procedure not used by this facility.	611	RESIDENTIAL SOLID WASTE DISPOSAL FIRES	Not required under this section.	NA
NA	No	Procedure not used by this facility.	612	LANDFILL DISPOSAL SITE FIRES	Not required under this section.	NA
NA	No	Procedure not used by this facility.	613	ORCHARD FIRES		NA
NA	No	Procedure not used by this facility.	614	PRESCRIBED BURNING		NA
NA	No	Facility is not in this source category.	615	DANGEROUS MATERIAL FIRES		NA
NA	No	Facility is not in this source category.	616	INFECTIOUS WASTE BURNING		NA
6	Yes		625	VISIBLE EMISSIONS	Record keeping and reporting.	Yes
NA	No	Facility does not have this emission unit.	626	GENERAL RESTRICTIONS ON VISIBLE EMISSIONS FROM WIGWAM BURNERS		NA
7	Yes		650	RULES FOR CONTROL OF FUGITIVE DUST	Record keeping and reporting.	Yes
NA	Yes		651	GENERAL RULES	Not required under this section.	Yes
NA	Yes		675	FUEL BURNING EQUIPMENT -- PARTICULATE MATTER	Not required under this section.	Yes
NA	No	Facility does not have this emission unit	676	STANDARDS FOR NEW SOURCES		NA



**AIR POLLUTION CONTROL REGULATIONS**  
**APPLICABLE REQUIREMENTS AND COMPLIANCE CERTIFICATION SUMMARY**

Emissions Unit(s) (see coding, page 12)	Applicable Requirement	Non-Applicable Reason	Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Record keeping, Monitoring, Reporting, Test Method)	In Compliance
NA	Yes		677	STANDARDS FOR MINOR AND EXISTING SOURCES	Not required under this section.	Yes
NA	Yes		678	COMBINATIONS OF FUELS	Not required under this section.	Yes
NA	Yes		679	AVERAGING PERIOD	Not required under this section.	Yes
NA	Yes		680	ALTITUDE CORRECTION	Not required under this section.	Yes
NA	Yes		681	TEST METHODS AND PROCEDURES	Not required under this section.	Yes
NA	No	Sections replaced by Section 710.	700 - 703	PARTICULATE MATTER -- PROCESS WEIGHT LIMITATIONS		NA
6	Yes		710	PARTICULATE MATTER -- PROCESS EQUIPMENT LIMITATIONS ON OR AFTER JULY 1, 2000	Record keeping and reporting.	Yes
NA	Yes		725	RULES FOR SULFUR CONTENT OF FUELS	Not required under this section.	Yes
NA	Yes		726	DEFINITIONS AS USED IN SECTIONS 727 THROUGH 729	Not required under this section.	Yes
NA	Yes		727	RESIDUAL FUEL OILS	Not required under this section.	Yes
NA	Yes		728	DISTILLATE FUEL OIL	Not required under this section.	Yes
NA	Yes		729	COAL	Not required under this section.	Yes
NA	No	Facility is not this source category.	750 - 752	RULES FOR CONTROL OF FLORIDE EMISSIONS	Not required under this section.	NA
NA	Yes		775	RULES FOR CONTROL OF ODORS	Not required under this section.	Yes
NA	Yes		776	GENERAL RULES	Not required under this section.	Yes
NA	No	Facility does not have this type of emission unit.	785 - 788	RULES FOR CONTROL OF INCINERATORS	Not required under this section.	NA
NA	No	Facility does not have this type of emission unit.	805 - 808	RULES FOR CONTROL OF HOT-MIX ASPHALT PLANTS	Not required under this section.	NA
NA	No	Facility does not have this type of emission unit.	815 - 826	RULES FOR CONTROL OF KRAFT PULPING MILLS	Not required under this section.	NA
NA	No	Facility does not have this type of emission unit.	835 - 839	RULES FOR CONTROL OF RENDERING PLANTS	Not required under this section.	NA
NA	No	Facility does not have this type of emission unit.	845 - 848	RULES FOR CONTROL OF SULFUR DIOXIDE EMISSIONS FROM SULFURIC ACID PLANTS	Not required under this section.	NA

# AIR POLLUTION CONTROL REGULATIONS

## APPLICABLE REQUIREMENTS AND COMPLIANCE CERTIFICATION SUMMARY

Emissions Unit(s) (see coding, page 12)	Applicable Requirement	Non-Applicable Reason	Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Record keeping, Monitoring, Reporting, Test Method)	In Compliance
NA	No	Facility does not have this type of emission unit.	855 - 858	COMBINED ZINC AND LEAD SMELTERS	Not required under this section.	NA
NA	No	Facility does not have this type of emission unit.	859	STANDARDS OF PERFORMANCE FOR MUNICIPAL SOLID WASTE LANDFILLS THAT COMMENCED CONSTRUCTION, RECONSTRUCTION OR MODIFICATION ON OR AFTER MAY 30, 1991	Not required under this section.	NA
NA	No	Facility does not have this type of emission unit.	860	EMISSION GUIDELINES FOR MUNICIPAL WASTE LANDFILLS THAT COMMENCED CONSTRUCTION, RECONSTRUCTION OR MODIFICATION BEFORE MAY 30, 1991	Not required under this section.	NA
NA	No	Facility does not have this type of emission unit.	861	STANDARDS OF PERFORMANCE FOR HOSPITAL/MEDICAL/INFECTIOUS WASTE INCINERATORS THAT COMMENCED CONSTRUCTION AFTER JUNE 20, 1996, OR FOR WHICH MODIFICATION IS COMMENCED AFTER MARCH 16, 1998	Not required under this section.	NA
NA	No	Facility does not have this type of emission unit.	862	EMISSION GUIDELINES FOR HOSPITAL/MEDICAL/INFECTIOUS WASTE ININERATORS THAT COMMENCED CONSTRUCTION BEFORE JUNE 20, 1996	Not required under this section.	NA

# AIR POLLUTION CONTROL REGULATIONS

## APPLICABLE REQUIREMENTS AND COMPLIANCE CERTIFICATION SUMMARY

Emissions Unit(s) (see coding, page 12)	Applicable Requirement	Non-Applicable Reason	Citation Under Federal Regulations	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Record keeping, Monitoring, Reporting, Test Method)	In Compliance
1 - 7	Yes		40 CFR Part 50	NATIONAL PRIMARY AND SECONDARY AMBIENT AIR QUALITY STANDARDS	Record keeping and reporting.	Yes
NA	No	Section applies to regulatory authorities	40 CFR Part 51	REQUIREMENTS FOR PREPARATION, ADOPTION, AND SUBMITTAL OF IMPLEMENTATION PLANS	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	40 CFR Part 52	APPROVAL AND PROMULGATION OF IMPLEMENTATION PLANS	Not required under this section.	NA
NA	No	Method not used by this facility	40 CFR Part 53	AMBIENT AIR QUALITY REFERENCE AND EQUIVALENT METHODS	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	40 CFR Part 54	PRIOR NOTICE OF CITIZEN SUITS	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	40 CFR Part 55	OUTER CONTINENTAL SHELF AIR REGULATIONS	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	40 CFR Part 56	REGIONAL CONSISTENCY	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	40 CFR Part 57	PRIMARY NONFERROUS SMELTER ORDERS	Not required under this section.	NA
NA	No	Facility is not this source category	40 CFR Part 58	AMBIENT AIR QUALITY SURVEILLANCE	Not required under this section.	NA
NA	No	Facility is not this source category	40 CFR Part 60	STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES	Not required under this section.	NA
NA	No	Facility is not this source category	40 CFR Part 61	NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS	Not required under this section.	NA
NA	No	Facility is not this source category	40 CFR Part 62	APPROVAL AND PROMULGATION OF STATE PLANS FOR DESIGNATED FACILITIES AND POLLUTANTS	Not required under this section.	NA
1 - 5	Yes		40 CFR Part 63	NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES	Record keeping and reporting.	Yes
NA	No	Section applies to regulatory authorities	40 CFR Part 65	DELAYED COMPLIANCE ORDERS	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	40 CFR Part 66	ASSESSMENT AND COLLECTION OF NONCOMPLIANCE PENALTIES BY EPA	Not required under this section.	NA

# AIR POLLUTION CONTROL REGULATIONS

## APPLICABLE REQUIREMENTS AND COMPLIANCE CERTIFICATION SUMMARY

Emissions Unit(s) (see coding, page 12)	Applicable Requirement	Non-Applicable Reason	Citation Under Federal Regulations	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Record keeping, Monitoring, Reporting, Test Method)	In Compliance
NA	No	Section applies to regulatory authorities	40 CFR Part 67	EPA APPROVAL OF STATE NONCOMPLIANCE PENALTY PROGRAM	Not required under this section.	NA
NA	No	Not Applicable to Tier I Sources	40 CFR Part 69	SPECIAL EXEMPTIONS FROM REQUIREMENTS OF THE CLEAN AIR ACT	Not required under this section.	NA
NA	No	Section applies to regulatory authorities	40 CFR Part 70	STATE OPERATING PERMIT PROGRAMS	Not required under this section.	NA
NA	No	Facility is not this source category	40 CFR Part 72	PERMITS REGULATION	Not required under this section.	NA
NA	No	Facility is not this source category	40 CFR Part 73	SULPHUR DIOXIDE ALLOWANCE SYSTEM	Not required under this section.	NA
NA	No	Facility is not this source category	40 CFR Part 75	CONTINUOUS EMISSION MONITORING	Not required under this section.	NA
NA	No	Facility is not this source category	40 CFR Part 77	EXCESS EMISSIONS	Not required under this section.	NA
NA	No	Facility is not this source category	40 CFR Part 78	APPEAL PROCEDURES FOR ACID RAIN PROGRAM	Not required under this section.	NA
NA	No	Facility is not this source category	40 CFR Part 79	REGISTRATION OF FUELS AND FUEL ADDITIVES	Not required under this section.	NA
NA	No	Facility is not this source category	40 CFR Part 80	REGULATION OF FUELS AND FUEL ADDITIVES	Not required under this section.	NA
NA	No	Facility is not this source category	40 CFR Part 82	PROTECTION OF STRATOSPHERIC OZONE	Not required under this section.	NA

**AIR POLLUTION CONTROL REGULATIONS  
APPLICABLE REQUIREMENTS AND COMPLIANCE CERTIFICATION SUMMARY**

EMISSION UNITS

- 1) Filament Application Machine #1
- 2) Filament Application Machine #2
- 3) Filament Application Machine #3
- 4) Chopper
- 5) Resin Storage
- 6) Dust Collection Cyclone
- 7) Facility-wide Fugitive Emissions

COMPLIANCE PLAN  
Spunstrand, Incorporated

To demonstrate compliance with the Tier I operating permit and 40 CFR Part 63, Subpart WWWW, Spunstrand Incorporated will monitor and record the amount of resin used, type of resin, application method and HAP content of the resin. The records will be compiled on a monthly basis from purchase records and MSDS or resin specifications supplied by the resin supplier and are summarized below.

Resin name and amount

Resin type - 1) corrosion resistant and or high strength (CR/HS)  
2) non-CR/HS  
4) low flame spread/low smoke  
5) shrinkage controlled  
6) tooling

Application method - 1) filament application  
2) mechanical application  
3) manual application  
4) other

% Organic HAP content (styrene, methylene chloride, MEKP) and  
Whether or not a vapor suppressant was used.

The records will be used to calculate annual organic HAP emissions using equations and emission factors found in 63.580 and Table 1 of 40 CFR Part 63, Subpart WWWW. The compliance plan for Spunstrand Incorporated is summarized in the following table.

**COMPLIANCE PLAN**  
**Spunstrand, Incorporated**

<b>Emission Unit</b>	<b>Name of Pollutant(s)</b>	<b>Monitoring Requirements</b>	<b>Method of Record Keeping</b>	<b>Reporting Requirements</b>	<b>Date of Implementation</b>
1. Filament Application Machine #1	HAPs (Styrene)	Following 40 CFR 63.5895, the monthly resin use, type of resin, application and HAP content of the resin used will be monitored based on purchase records.	Following 40 CFR Part 63.5915 including data, assumptions and calculations used to determine organic HAP emission factors and content.	IDAPA 58.01.01.322.08 and 40 CFR 63.5910(b) as specified in Table 14 of 40 CFR Part 63, Subpart WWW.	Upon final approval of permit.
2. Filament Application Machine #2	HAPs (Styrene)	Following 40 CFR 63.5895, the monthly resin use, type of resin, application and HAP content of the resin used will be monitored based on purchase records.	Following 40 CFR Part 63.5915 including data, assumptions and calculations used to determine organic HAP emission factors and content.	IDAPA 58.01.01.322.08 and 40 CFR 63.5910(b) as specified in Table 14 of 40 CFR Part 63, Subpart WWW.	Upon final approval of permit.
3. Filament Application Machine #3	HAPs (Styrene)	Following 40 CFR 63.5895, the monthly resin use, type of resin, application and HAP content of the resin used will be monitored based on purchase records.	Following 40 CFR Part 63.5915 including data, assumptions and calculations used to determine organic HAP emission factors or content.	IDAPA 58.01.01.322.08 and 40 CFR 63.5910(b) as specified in Table 14 of 40 CFR Part 63, Subpart WWW.	Upon final approval of permit.
4. Chopper	HAPs (Styrene)	Following 40 CFR 63.5895, the monthly resin use, type of resin, application and HAP content of the resin used will be monitored based on purchase records.	Following 40 CFR Part 63.5915 including data, assumptions and calculations used to determine organic HAP emission factors or content.	IDAPA 58.01.01.322.08 and 40 CFR 63.5910(b) as specified in Table 14 of 40 CFR Part 63, Subpart WWW.	Upon final approval of permit.
5. Resin Storage	HAPs (Styrene)	NA	Table 4 to Subpart WWW of 40 CFR Part 63 Work Practice Standards	IDAPA 58.01.01.322.08 and 40 CFR 63.5910(b) Semiannually	Upon final approval of permit.
6. Dust Collection Cyclone	Opacity TSP PM10	Quarterly inspection for visible emissions and conduct Method 9 evaluation using procedures in IDAPA 58.01.01.625 if visible emissions are observed or take corrective action to eliminate the visible emissions.	Maintain records of quarterly inspections and Method 9 opacity observations and/or corrective actions taken.	Excess emission records (5 years) IDAPA 58.01.01.136	Upon final approval of permit.

COMPLIANCE PLAN  
Spunstrand, Incorporated

Emission Unit	Name of Pollutant(s)	Monitoring Requirements	Method of Record Keeping	Reporting Requirements	Date of Implementation
7. Facility wide Fugitive Emissions	Opacity TSP PM10	Quarterly facility-wide inspection of potential sources of fugitive emissions and taking corrective actions to control excessive fugitive emissions.	Maintain records of quarterly inspections and actions taken to reasonable control fugitive emissions.	NA	Upon final approval of permit.



**Almer Casile**

**From:** Jay DeLeon [jayd@spunstrand.com]  
**Sent:** Friday, June 23, 2006 11:51 AM  
**To:** Almer Casile  
**Cc:** 'Kirk Nelson'  
**Subject:** Questions PTC

Almer,

Here are the answers to the questions from your March 22, 2006 fax to Kirk Nelson.

Question #1 63.5790

- A) existing source
- B) open molding  
mixing  
cleaning of equipment used in reinforced plastic composites manufacture  
HAP-containing materials storage  
Repair on parts we also manufacture
- C) At this time no exclusion
- D) At this time no resin that must meet military specifications

Question #2 Table 1 of 40 CFR 63 the HAP emission factors that apply to Spunstrand Inc...

- |                |   |                              |
|----------------|---|------------------------------|
| 1. open mold   | a.) manual resin application                | i) nonvapor-suppressed resin |
|                | b) N/A                                      |                              |
|                | c) nonatomized mechanical resin application | i) nonvapor-suppressed resin |
|                | d) N/A                                      |                              |
|                | e) filament application                     | i) nonvapor-suppressed resin |
|                | f) atomized spray gel coat application      | nonvapor-suppressed resin    |
|                | g) N/A                                      |                              |
|                | h) N/A                                      |                              |
| 2. centrifugal | a) N/A                                      |                              |
|                | b) N/A                                      |                              |

Also, please don't forget that I need the lists of Idaho's air pollutants, from 585,586.

Thank you,  
 Jay DeLeon  
 Plant Superintendent  
 Spunstrand Inc.